

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

WHOLESOME SOY PRODUCTS, INC.,
a corporation,

and

JULIA TRINH and
PAUL TRINH,
individuals,

Defendants

Case No. 1:15-cv-2974

MOTION FOR JUDGMENT

The United States of America, Plaintiff, by and through its undersigned counsel, hereby respectfully requests that the Court sign and enter the attached Consent Decree in the above-captioned action. Ex. 1. The Consent Decree resolves all claims the United States raises. All parties have agreed to entry of the Consent Decree, as evidenced by their signatures thereon. Accordingly, the United States respectfully requests that the Court sign and enter the Consent Decree as a judicial order.

Dated this 3rd day of April, 2015.

Respectfully submitted,

By: /s/ Daniel M. Baeza
DANIEL M. BAEZA
Consumer Protection Branch
Department of Justice
Civil Division
6th Floor South
450 Fifth Street, N.W.
Washington, DC 20001
Phone: (202) 616-4916
E-mail: Dan.Baeza@usdoj.gov

Of Counsel:

WILLIAM B. SCHULTZ
General Counsel
U.S. Dept. of Health and
Human Services
ELIZABETH H. DICKINSON
Chief Counsel
Food and Drug Division

PERHAM GORJI
Deputy Chief Counsel
Food and Drug Division

CHARLOTTE HINKLE
Assistant Chief Counsel
Food and Drug Division
10903 New Hampshire Avenue
Silver Spring, MD 20993-0002
Charlotte.Hinkle@fda.hhs.gov

CERTIFICATE OF SERVICE

I, Daniel M. Baeza, certify that on April 3, 2015, I served a true copy of the Motion for Judgment on all counsel of record via e-mail.

/s/ Daniel M. Baeza
DANIEL M. BAEZA